



and Johnson Group (J&J, Centocor, Ortho-Biotech, Ortho-McNeil, McNeil, Janssen, Ortho-Neutrogena, and Johnson & Johnson Health Care Services), and the Schering-Plough Group (Schering and Warrick).

4. Plaintiffs anticipate filing their motion and supporting papers on time. This is a pivotal motion in this litigation and in their memorandum, Plaintiffs need to address class certification issues as to each of the five fast track defendants. Plaintiffs cannot fully, or even adequately, address all of the class certification issues in twenty pages or less. Instead, Plaintiffs believe that their Memorandum of Law will be approximately sixty-five (65) pages in length.

5. Plaintiffs submit that given the importance of this motion to the case that substantial justice would be served by granting Plaintiffs leave to file a memorandum not to exceed 65 pages.

WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiffs leave to file a Memorandum of Law in Support of Plaintiffs' Motion for Class Certification in excess of twenty (20) pages.

DATED: August 25, 2004

By /s/ Steve W. Berman  
Steve W. Berman  
Sean R. Matt  
Hagens Berman LLP  
1301 Fifth Avenue, Suite 2900  
Seattle, WA 98101  
Telephone: (206) 623-7292  
Facsimile: (206) 623-0594  
**LIAISON COUNSEL**

Thomas M. Sobol (BBO#471770)  
Edward Notargiacomo (BBO#567636)  
Hagens Berman LLP  
One Main Street, 4th Floor  
Cambridge, MA 02142  
Telephone: (617) 482-3700  
Facsimile: (617) 482-3003  
**LIAISON COUNSEL**

Samuel Heins  
Heins, Mills & Olson, P.C.  
3550 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
Telephone: (612) 338-4605  
Facsimile: (612) 338-4692

Eugene A. Spector  
Spector, Roseman & Kodroff, P.C.  
1818 Market Street, Suite 2500  
Philadelphia, PA 19103  
Telephone: (215) 496-0300  
Facsimile: (215) 496-6611  
**CHAIRS OF LEAD COUNSEL  
COMMITTEE**

Marc H. Edelson  
Hoffman & Edelson  
45 West Court Street  
Doylestown, PA 18901  
Telephone: (215) 230-8043  
Facsimile: (215) 230-8735

Kenneth A. Wexler  
Elizabeth A. Fegan  
The Wexler Firm  
One North LaSalle Street, Suite 2000  
Chicago, IL 60602  
Telephone: (312) 346-2222  
Facsimile: (312) 346-0022  
**MEMBERS OF LEAD COUNSEL  
COMMITTEE AND EXECUTIVE  
COMMITTEE**

Michael McShane  
Alexander, Hawes & Audet, LLP  
300 Montgomery Street, Suite 400  
San Francisco, CA 94104  
Telephone: (415) 982-1886  
Facsimile: (415) 576-1776

Robert E. Piper, Jr.  
Piper & Associates  
624 Pierre Avenue  
Shreveport, LA 71103  
Telephone: (318) 226-0826  
Facsimile: (318) 424-9900  
**MEMBERS OF EXECUTIVE  
COMMITTEE**

Anthony Bolognese  
Bolognese & Associates  
One Penn Center  
1617 JFK Boulevard  
Suite 650  
Philadelphia, PA 19103  
Tel: (215) 814-6750  
Fax: (215) 814-6764

Jonathan W. Cuneo  
The Cuneo Law Group  
317 Massachusetts Ave., N.E., Suite 300  
Washington, D.C. 20002  
Tel: (202) 789-3960  
Fax: (202) 789-1813

Neal Goldstein (Of Counsel)  
Freedman & Lorry, PC  
400 Market Street, Suit 900  
Philadelphia, PA 19106  
Tel: (215) 925-8400  
Fax: (215) 925-7516

Michael E. Criden  
Hanzman & Criden, PA  
Commerce Bank Center, Suite 400  
220 Alhambra Circle  
Coral Gables, FL 33134  
Tel: (305) 357-9000  
Fax: (305) 357-9050

Blake M. Harper  
Kirk B. Hulett  
Hulett Harper LLP  
550 West C Street, Suite 1700  
San Diego, CA 92101  
Tel: (619) 338-1133  
Fax: (619) 338-1139

Jonathan D. Karmel  
Karmel & Gilden  
221 N. LaSalle Street, Suite 1414  
Chicago, IL 60601  
Tel: (312) 641-2910  
Fax: (312) 641-0781

Dianne M. Nast  
Roda & Nast, PC  
801 Estelle Drive  
Lancaster, PA 17601  
Tel: 717-892-3000  
Fax: 717-892-1200

Henry H. Rossbacher  
Rossbacher & Associates  
811 Wilshire Boulevard, Suite 1650  
Los Angeles, CA 90017-2666  
Tel: (213) 895-6500  
Fax: (213) 895-6161

Jonathan Shub  
Sheller, Ludwig & Badey, P.C.  
1528 Walnut Street, 3rd fl  
Philadelphia, PA 19102  
Tel: (215) 790-7300  
Fax: (215) 546-0942

Scott R. Shepherd  
Shepherd & Finkleman, LLC  
117 Gayley Street, Suite 200  
Media, PA 19063  
Tel: (610) 891-9880  
Fax: (610) 891-9883

Lisa J. Rodriguez  
Ira Neil Richards  
Trujillo Rodriguez & Richards, LLC  
The Penthouse  
226 West Rittenhouse Square  
Philadelphia, PA 19103  
Tel: (215) 731-9004  
Fax: (215) 731-9044

Mitchell A. Toups  
Weller, Green, Toups & Terrell, L.L.P.  
2615 Calder Street, Suite 400  
P.O. Box 350  
Beaumont, TX 77704  
Tel: (409) 838-0101  
Fax: 409-838-6780

Damon Young  
Lance Lee  
Young, Pickett & Lee  
4122 Texas Boulevard  
P.O. Box 1897  
Texarkana, AR/TX 75504  
Tel: (903) 794-1303  
Fax: 903-792-5098; 903-794-5098  
**ADDITIONAL ATTORNEYS FOR  
PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I hereby certify that I, Steve W. Berman, an attorney, caused a true and correct copy of the foregoing **PLAINTIFFS' MOTION FOR LEAVE TO FILE MEMORANDUM IN EXCESS OF TWENTY PAGES** to be delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on August 25, 2004, a copy to Verilaw Technologies for Posting and notification to all parties

By           /s/ Steve W. Berman            
Steve W. Berman  
**HAGENS BERMAN LLP**  
1301 Fifth Avenue, Suite 2900  
Seattle, WA 98101  
(206) 623-7292